REMARKS

In view of the foregoing amendments and the following remarks, Applicants respectfully submit the instant application is in condition for allowance, an indication of which is respectfully requested.

As a preliminary matter, Applicants' representative have contacted Examiner Vu and requested a telephonic interview to be conducted in this case. The interview is scheduled to be conducted after filing of this response.

Claim Rejections - 35 U.S.C. § 103

Claims 1-5 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 6,895,502 ("Fraser") in view of U.S. Patent Publication Number 2004/0236556 ("Lin"). Applicants traverse this rejection for at least the following reasons.

The proposed combination of Fraser and Lin, at a minimum, fails to describe or suggest that (*i*) the client device comprises ***a first interface*** for accessing the anti-tampering memory area, ***a second interface*** for accessing the non-volatile memory area, and ***an access control driver***, coupled to the first interface and the second interface, for accessing the common interface, and the client device is configured to: access the anti-tampering memory area via ***the first interface, the access control driver, and the common interface***, and access the non-volatile memory area via ***the second interface, the access control driver, and the common interface***, (ii) the access control driver is ***configured to process congestion control*** such that an access for the non-volatile memory area is saved when the access request for the non-volatile memory area is made before a response to a previous access request to the anti-tempering memory area, and the

access for the non-volatile memory area is performed after the response to the previous access request, as recited in amended claim 1.

Fraser, in FIG. 1, illustrates a secure system 10 including a server 12, a client computer 14 communicating with server 12 via a communications pathway 15, and a secure environment 16 that includes an intelligent security token in the form of a smart card 18. *See*, Fraser at col. 8, lines 34-45. The smart card 18 includes an associated card reader 20 and interfaces with the client 14 through the path 34. *See*, Fraser at col. 8, lines 45-46.

The Office Action asserts that the server 12, the client computer 14, and the smart card 18 respectively correspond to the server, the client device, and the storage medium recited in claim 1. *See*, Office Action at page 3. Furthermore, the Office Action asserts that the alleged client device 14 is configured to access the alleged storage medium via the reader 20 of the smart card 18. *See*, Office Action at page 4. Assuming, *arguendo*, these assertions are correct, Fraser fails to describe or suggest that the client device comprises ***a first interface*** for accessing the anti-tampering memory area, ***a second interface*** for accessing the non-volatile memory area, and ***an access control driver***, coupled to the first interface and the second interface, for accessing the common interface, and the client device is configured to: access the anti-tampering memory area via ***the first interface, the access control driver, and the common interface***, and access the non-volatile memory area via ***the second interface, the access control driver, and the common interface***, as recited in amended claim 1.

In particular, in the relied upon portions, Fraser fails to describe or suggest a client device that includes one interface for accessing the anti-tampering memory area and another interface for accessing the non-volatile memory area. To this end, Fraser naturally fails to describe or suggest a client device configured to: (a) access the anti-tampering memory area via the first

interface, the access control driver, and the common interface, and (b) access the non-volatile memory area via the second interface, the access control driver, and the common interface.

Furthermore, the Office Action concedes that Fraser fails to explicitly disclose "an access for the non-volatile memory area being arranged to be saved when the access request for the non-volatile memory area is made before a last response of the plurality of sequential responses to a previous access request, and the access for the non-volatile memory area being performed after the last response to the previous access request." *See*, Office Action at page 5. As such, Fraser naturally fails to describe or suggest that the access control driver is ***configured to process congestion control*** such that an access for the non-volatile memory area is saved when the access request for the non-volatile memory area is made before a response to a previous access request to the anti-tempering memory area, and the access for the non-volatile memory area is performed after the response to the previous access request, as recited in amended claim 1.

Lin is equally deficient. The Office Action relies on Lin for an alleged teaching of "an access for the non-volatile memory area being arranged to be saved when the access request for the non-volatile memory area is made before a last response of the plurality of sequential responses to a previous access request, and the access for the non-volatile memory area being performed after the last response to the previous access request." *See*, Office Action at page 5 (citing paragraphs [84, 93] of Lin).

Lin, in paragraphs [84, 93], describes time-schedule processing and a first-in first-out ("FIFO") queuing. For example, in paragraph [84], Lin describes that for different users having the same priority, jobs are processed with an equal priority on a first-in first-out basis. That is, the first job executes until it completes or a fixed time slice expires, whichever comes first, before the second job executes. However, in the relied upon portions, Lin describes execution of

jobs and does not describe anything about a response. That is, Lin does not describe whether a response is generated after execution of the first job and making a determination to execute the second job after the response to the first job.

As such, Lin fails to describe or suggest an access control driver configured to process congestion control such that an access for the non-volatile memory area is saved when the access request for the non-volatile memory area is made before ***a response*** to a previous access request to the anti-tempering memory area, and the access for the non-volatile memory area is performed after ***the response*** to the previous access request, as recited in amended claim 1.

Furthermore, even assuming for the sake of argument that Lin somehow teaches this feature, the proposed combination of Fraser and Lin still fails to describe or suggest that the client device comprises ***a first interface*** for accessing the anti-tampering memory area, ***a second interface*** for accessing the non-volatile memory area, and ***an access control driver***, coupled to the first interface and the second interface, for accessing the common interface, and the client device is configured to: access the anti-tampering memory area via ***the first interface, the access control driver and the common interface***, and access the non-volatile memory area via ***the second interface, the access control driver, and the common interface***, as recited in amended claim 1.

Therefore, the proposed combination of Fraser and Lin fails to satisfy claim 1 or any of the claims dependent on claim 1. Applicants therefore respectfully request reconsideration and withdrawal of the rejection 1, along with its dependent claims.

Claim 6 was rejected under § 103(a) as being unpatentable over Fraser in view of Lin and further in view of U.S. Patent Publication Number 2003/0040929 ("Knegendorf"). Claim 7 was rejected § 103(a) as being unpatentable over Fraser in view of Lin and further in view of U.S.

Patent Number 5,652,892 ("Ugajin"). Claim 8 was rejected under § 103(a) as being unpatentable over Fraser in view of Lin and further in view of U.S. Patent Number 6,920,561 ("Gould"). Claims 6-8 variously depend from claim 1. The secondary references were cited for alleged teachings of various features recited in dependent claims 6-8 and do not suggest the aspects of claim 1 discussed above. Hence, none of the proposed combinations satisfy claim 1 or any of the claims dependent on claim 1. Applicants therefore respectfully request reconsideration and withdrawal of the rejections of claims 6-8.

Conclusion

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,
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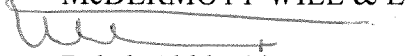

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